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September 8, 2016 VIA ECF

Hon. Colleen McMahon United States District Judge Southern District of New York 500 Pearl Street, Room 1640 New York, NY 10067

Re:

Jane Doe v. Al Jazeera Media Network (AJMN), et al.

Civil Action No. 16-CV-06416 (CM)

Dear Judge McMahon:

We represent defendants Al Jazeera Media Network ("AJMN") and Al Jazeera America, LLC ("AJAM") in connection with the above-referenced matter. We write to request an extension of time, to and including October 7, 2016, for AJMN and AJAM to answer, move or otherwise respond to plaintiff's Complaint (AJMN's response is currently due September 14, 2016 and AJAM's response is due September 27, 2016). No previous requests for an extension have been made. The reason for this extension request is that our client contact is currently unavailable until September 16, 2016 due to the Eid holiday, defense counsel has an arbitration hearing scheduled to commence on September 26, 2016, and we require additional time to investigate the allegations of the Complaint and, if necessary, prepare a motion to dismiss. Plaintiff's counsel has consented to this request.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

DLA Piper LLP (US)

Daniel Turinsky Partner

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cc: Tahanie A. Aboushi, Esq. (via e-mail)